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Attorneys for Defendant APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.

Plaintiff, Counter-defendant

v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR

**DECLARATION OF MARNI GOLDBERG
IN SUPPORT OF APPLE INC.'S
RESPONSES TO OBJECTIONS TO
SPECIAL MASTER RULINGS ON APPLE
INC.'S PRODUCTIONS OF RE-
REVIEWED PRIVILEGED DOCUMENTS**

The Honorable Thomas S. Hixson

DECLARATION OF MARNI GOLDBERG IN
SUPPORT OF APPLE INC.'S RESPONSES TO
OBJECTIONS TO SPECIAL MASTER RULINGS ON
APPLE INC.'S PRODUCTIONS OF RE-REVIEWED
PRIVILEGED DOCUMENTS

CASE No. 4:20-cv-05640-YGR

1 I, Marni Goldberg, hereby declare as follows:

2 1. I am a Corporate Communications Director at Apple Inc. ("Apple"). I have been in that
3 role since October 2020. I have personal knowledge of the facts stated below and, if called as a witness,
4 would testify competently thereto.

5 2. I understand that a document entitled "040423 Epic meeting injunction.docx" was
6 collected from my files for this litigation and that Apple has asserted privilege over that document.

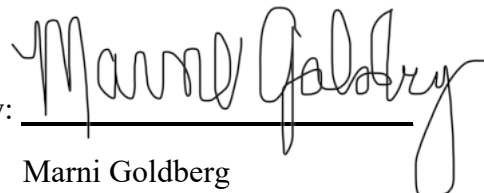
7 3. Based on my review of that document and to the best of my recollection, the document
8 comprises notes that I took at a meeting on April 4, 2023 regarding planning for the then-forthcoming
9 decision from the Ninth Circuit in this case.

10 4. The organizer of that meeting was Kate Adams (the General Counsel of Apple), and other
11 attendees included Heather Grenier, Kyle Andeer, and Alanna Rutherford. At that time, Ms. Grenier,
12 Mr. Andeer, and Ms. Rutherford were all in-house counsel at Apple.

13
14 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
15 true and correct.

16 Dated: April 1, 2025

Respectfully submitted,

17
18 By: 
19 Marni Goldberg